



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

January 3, 2024

BY ECF

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Edwin Pagan III*, 24 Cr. 641 (JHR)

Dear Judge Rearden:

The Government writes, in response to the Court's December 24, 2024 Order (Dkt. No. 23), and with the consent of the defendant, to request that the Court adjourn the status conference currently scheduled for January 14, 2025 to a date in early to mid-March 2025 and to also exclude time until the date of the adjourned status conference under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The best dates for defense counsel are March 4, 5, or 6, 2025. The Government is also available those days, or at a later date at the Court's convenience.

The Government has informed the defendant that it is prepared to produce Rule 16 discovery materials, but is waiting to receive a hard drive from the defendant to facilitate that production. We understand that drive should be received shortly. The parties agree that an adjournment of the January 14 status conference is appropriate to permit time for the Government to produce discovery and for the defendant to review that discovery and consider any potential motions.

Respectfully submitted,

EDWARD Y. KIM
Assistant United States Attorney

By: _____/s/
Mathew Andrews / Emily Deininger
Assistant United States Attorneys